

REMARKS/ARGUMENTS

Claims 47 and 71 are amended. Claims 47-72 remain pending in the application, although claims 48-70 and 72 are withdrawn. Applicants respectfully request reexamination and reconsideration of the application.

Initially, Applicants continue to assert respectfully that the Restriction of September 29, 2005 is improper and reserve the right to petition the Director to review the Restriction under 37 C.F.R. §§ 1.144 and 1.181. Applicants wish to thank the Examiner for discussing the matter during a visit on November 16, 2005.

Claims 47-71 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,173,451 to Kinsman et al. ("Kinsman") in view of U.S. Patent No. 5,123,850 to Elder et al. ("Elder"). Applicants respectfully traverse this rejection.

Claim 47 states that the "contact elements" form pressure connections with "ones of said resilient contact structures *without bonding to the resilient contact structures.*" Kinsman fails to teach or suggest that the lead wires 51 (which the PTO equated with the resilient contact structures of claim 47) make pressure connections with pads 37 of die cavity 13 (which the PTO equated, respectively, with the contact structure and test board of claim 47) without bonding to the pads 37. Indeed, Figure 3 of Kinsman shows what appears to be a wedge bond of the lead wire 51 to pad 37.

Moreover, in the only configuration disclosed in Kinsman, which is best seen in Figure 3, the lead wires 51 would not form electrical connections with the pads 37 that are sufficiently reliable to perform the testing and burn in of the die 21 described in Kinsman unless the lead wires 51 are bonded to the pads 37. Thus, the only way in which the burn in fixture 11 disclosed in Kinsman can perform its intended functions of testing and burning in the die 21 is if the lead wires 51 are bonded to the pads 37 of the die cavity 13.

Kinsman thus fails to teach or suggest "contact elements" that form pressure connections with "ones of said resilient contact structures *without bonding to the resilient contact structures.*" Elder, which was cited solely for its alleged teachings regarding burning in a wafer—as opposed to a die—does not make up for the above deficiency in Kinsman. Therefore, claim 47 is patentable over Kinsman and Elder.

Dependent claim 71 depends from claim 47 and is therefore also patentable at least because of its dependency from claim 47. Moreover, claim 71 includes additional features that further distinguish over the prior art of record. For example, claim 71 states that "resilient contact structures" comprise "an electrically conductive structure" that is "a spring," and claim 71 further states "wherein when pressed against one of said contact elements of said test board, said spring generates a contact force sufficient to establish an electrical connection with said contact element." Assuming for sake of argument that any solid metal has at least some inherent minuscule spring qualities (as alleged in the Office Action), such minuscule spring qualities would be woefully insufficient to generate a contact force such as the contact force described in claim 71. Claim 71 is therefore independently patentable over Kinsman and Elder.

In view of the foregoing, Applicants submit that all of the claims are allowable and the application is in condition for allowance. If the Examiner believes that a discussion with Applicants' attorney would be helpful, the Examiner is invited to contact the undersigned at (801) 323-5934.

Respectfully submitted,

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